

Stephen G. Wilcox
State Bar Number 21454300
WILCOX LAW, PLLC
P.O. Box 201849
Arlington, TX 76006
(817) 870-1694 Telephone
swilcox@wilcoxlaw.net

ATTORNEY FOR AMERICREDIT FINANCIAL SERVICES, INC. D/B/A GM FINANCIAL

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE: §
§
NB HOTELS DALLAS LLC, § CASE NO. 22-30681-SWE-11
DEBTOR. §

OBJECTION TO CONFIRMATION

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COMES NOW, Americredit Financial Services, Inc. d/b/a GM Financial, Creditor, objecting to the confirmation of the Chapter 11 Plan proposed by NB Hotels Dallas LLC ("Debtor") and would respectfully show the Court as follows:

1. Creditor has a perfected security interest in a 2020 Mercedes-Benz GLE, vehicle identification number 4JGFB4KB6LA011721. As of the date of filing, Creditor was owed \$41,101.12.
2. Creditor is entitled to an interest rate that is equal to prime at confirmation increased by an additional risk factor which is reflective of the risk of non-payment.
3. Creditor objects to the term of 84 months as such term is unreasonable given the depreciation of the vehicle.
4. Creditor objects in that the Plan should provide that any terms of the contract between Creditor and Debtor should be enforceable unless specifically changed by the plan, including the requirement to maintain the collateral and to maintain insurance.

WHEREFORE, PREMISES CONSIDERED, Creditor prays for an Order of this Court:

1. Denying confirmation of Debtor's Chapter 11 Plan as proposed; and
2. For such other and further relief, both general and specific, to which Creditor may show itself justly entitled.

Respectfully submitted,

/s/ Stephen G. Wilcox
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Objection to Confirmation was served by FIRST CLASS MAIL, POSTAGE PRE-PAID on:

NB Hotels Dallas LLC
13402 Noel Road
Dallas, TX 75240

and ELECTRONICALLY SERVED on:

Joyce Lindauer
1412 Main St., Suite 500
Dallas, TX 75202

Office of the U.S. Trustee
1100 Commerce, Room 976
Dallas, Texas 75242

Dated on August 26, 2022.

/s/ Stephen G. Wilcox
Stephen G. Wilcox

9040-00734-547489